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December 21, 2020

VIA ECF & EMAIL

Hon. John P. Cronan, U.S.D.J. United States Courthouse 550 Pearl Street New York, NY 10007 Email: CronanNYSDChambers@nysd.uscourts.gov

Re: Valentini v. Group Health Inc., et al., No. 1:20 Civ. 09526

Dear Judge Cronan:

Along with co-counsel Merson Law, we represent the Plaintiff, Mr. Valentini.

We are currently preparing a brief in opposition to the Defendants' motion to dismiss. Because the Defendants have filed two different motions – one on behalf of each of the two Defendants – we would be entitled to file two 25-page briefs. We respectfully request the Court's permission to file a single 40-page (maximum) brief, addressing both Defendants' motions.

In addition, we respectfully request a 10-day extension – until January 18^{th} – to file our opposition. My younger son is a serving Marine who is about to be deployed in February. I have not seen him since his return from Iraq last winter, and I would like to try to see him.

I have met and conferred with Defendants' counsel, and they consent to both requests. (E-mails attached.) If Your Honor grants our extension, we ask that you also grant Defendants' request to extend their reply date until February 4th.

Thank you.

We wish everyone a safe and happy holiday.

It is hereby ORDERED that Plaintiffs' requests are GRANTED. Sincerely, Plaintiffs may file a single 40-page brief responding to Defendants' two Motions to Dismiss. Plaintiffs shall submit their opposition by /s/ Steve Cohen January 18, 2021, and Defendants shall submit their replies by February 4, 2021. The Court wishes Mr. Cohen's son the best Steve Cohen and thanks him for his service.

SO ORDERED.

Date: December 22, 2020

New York, New York

JOHN P. CRONAN United States District Judge